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## REMARKS

Claims 1-4 and 7 were previously pending in this application. Claims 1-4 and 7 have been amended. Specifically, independent claim 1 had been amended to positively recite a bundle of elongate semipermeable polymeric fibers attached to a connecting sleeve. This amendment is supported by the specification by originally filed claim 17. Also in claim 1, the phrase "side wall split" has been changed to "side wall having a split" for clarity. Claims 2-4 and 7 have been amended for uniformity in dependent claim language. New claims 34-46 have been added.

New claims 34 and 35 depend (directly or indirectly) from independent claim 1 and are directed to four connecting collars, which are disposed in a common plane and have parallel axes. These claims are supported in the specification by originally filed claims 14 and 15.

New independent claim 36 is directed to a membrane filtration system having a a housing; at least one submodule comprising an elongate bundle of semipermeable polymeric fibers attached to a connecting sleeve having a locking formation; at least one submodule connecting collar connected with said housing, said collar releasably secured to the sleeve at an end by a resiliently biased clip. This claim and the claims that depend therefrom are supported in the specification by the claims as originally filed.

As a result claims 1-4, 7 and 34-46 are pending for examination with claims 1 and 36 being independent claims. No new matter has been added.

## Rejection under 35 U.S.C. §112

The Office Action rejected claims 1-4 and 7 under 35 U.S.C. §112, second paragraph. As noted above, claim 1 has been amended to recite "a sidewall having a split." Therefore, withdrawal of this rejection is respectfully requested.

## Rejections Under 35 U.S.C. §102

The Office Action rejected claims 1-4 and 7 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 4,839,048 to Reed et al. (hereinafter Reed).

Reed discloses a container for a filter cartridge and a pressurized fluid. The filter cartridge comprises end caps 204, 205 sealed against shell 203. (Reed, col. 5, lines 1-22.) Casing 224 for the filter cartridge comprises two end restraints 230, 231 connected to casing 224 by clamp rings 233, 234. Each clamp ring 233, 234 has two arms 235, 236 which are pivotable 773682.1

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about two pivot pins 240,241 allowing a bolt 242 at the end of one arm 235 to engage or disengage a wing nut 243 at the end of the other arm 236. (Reed, col. 6, lines 6-14.)

Reed fails to disclose, teach, or suggest, a membrane filtration system manifold comprising a housing; at least one submodule comprising an elongate bundle of semipermeable polymeric fibers attached to a connecting sleeve having a locking formation; at least one submodule connecting collar connected with said housing, said collar releasably secured to the sleeve at an end by a resiliently biased clip as recited, in part, in independent claim 1.

Nowhere do Applicants observe an elongate bundle of semipermeable polymeric fibers in Reed. In addition, in Reed, the filter unit is not attached to cartridge shell 203, but moves freely within shell 203. According to Reed,

"as the pressurized fluid within the filter cartridge 201 bears against end caps 204, 205, the end caps 204, 205 slide along the shell 203 until they abut the end restrains 230, 231 of the sheath arrangement 202. If the end caps 204, 205 were rigidly connected to the shell 203, the filter cartridge 201 might fracture at the connection due to stresses generated by the differently directed forces acting on the shell 203 and the end caps 204, 205." (Reed, col. 6, lines 40-48.)

Finally, the clamp ring in Reed comprises two arms that move about two pivot points that are secured to one another by a bolt, and would therefore not be resiliently biased. If the clamps in Reed were resiliently biased, there would be no need for two pivot points to allow movement of the two arms. As such, independent claim1 is novel over Reed. Claims 2-4 and 7 depend directly or indirectly from claim 1 and are novel for at least the above mentioned reasons. Accordingly, withdrawal of this rejection is, therefore, respectfully requested.

New dependent claim 34 and 35 depend (directly or indirectly) from independent claim 1 and are patentable for at least the same reasons.

New independent claim 36 is directed to a membrane filtration system comprising a first housing and a plurality of submodules, wherein each submodule comprises an elongate bundle of fibers and a first connecting sleeve positioned about the bundle of fibers at one end of the bundle of fibers, wherein the sleeve comprises a locking formation. The system also comprises a plurality of first collars attached to the first housing and a plurality of resiliently biased clips, wherein each of the plurality of first collars is constructed and arranged to receive the first connecting sleeve of one of the plurality of submodules, and wherein each of the clips comprises a sidewall having a split to define opposed wall edges, and wherein each of the plurality of clips

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is releasably connected to one of the plurality of first collars and the locking formation of the first connecting sleeve of one of the plurality of submodules.

As noted above, Reed fails to disclose, teach, or suggest, a membrane filtration system comprising a housing and a plurality of submodules comprising an elongate bundle of fibers and a connecting sleeve having a locking formation. Reed also fails to disclose a plurality of collars attached to the housing and a plurality of resiliently biased clips releasably connected to one of the plurality of collars and the locking formation of the connecting sleeve.

In addition, none of the previously cited references disclose, teach, or suggest the present invention as recited in new independent claim 36. As such, new independent claim 36, as well as dependent claims 37-46 are patentable.

## CONCLUSION

In view of the foregoing amendments and remarks, reconsideration is respectfully requested. This application should now be in condition for allowance; a notice to this effect is respectfully requested. If the Examiner believes, after this amendment, that the application is not in condition for allowance, the Examiner is requested to call the Applicants' attorney at the telephone number listed below.

If this response is not considered timely filed and if a request for an extension of time is otherwise absent, Applicants hereby request any necessary extension of time. Please charge the extension fee, and any other deficiency to Deposit Account No. 50/2762.

Respectfully submitted,

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